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9 Attorneys for JACKSON RANCHERIA DEVELOPMENT CORP

10 UNITED STATES BANKRUPTCY COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 In re:

14 PG&E CORPORATION

15 - and -

16 PACIFIC GAS AND ELECTRIC  
17 COMPANY,

18 Debtors.

Case No: 19-30088 (DM)  
Chapter 11

DECLARATION IN SUPPORT OF  
OPPOSITION TO REORGANIZED  
DEBTORS' ONE HUNDRED TWENTIETH  
OMNIBUS OBJECTION TO CLAIMS – BY  
JACKSON RANCHERIA DEVELOPMENT  
CORP (CLAIM NO. 3002)

Date: May 24, 2023  
Time: 10:00 a.m.  
Location: (Video/Teleconference Only)  
U.S. Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> floor  
San Francisco, CA 94102  
Judge: Honorable Dennis Montali

21  
22 I, Crystal Jack, declare as follows:

23 1. I am the Chief Executive Officer for JACKSON RANCHERIA  
24 DEVELOPMENT CORP, (hereinafter referred to as "Jackson") the creditor in the above-  
25 captioned matter, which filed Claim No. 3002 on or about May 15, 2019. Based on the review of  
26 records, I have personal knowledge of the matter set forth herein, and if called upon to do so,  
27 could and would competently, truthfully, and accurately testify hereto.  
28

1           2.       A true and correct copy of Jackson's claim, with the supporting evidence and  
2 documents is attached hereto as "Exhibit A."

3           3.       Jackson owns real property in Jackson, California in the vicinity of New York  
4 Ranch Road.

5           4.       On June 24, 2017, a wildfire was reported at approximately 2:30 PM, alongside  
6 New York Ranch Road, along a PG&E box/power pole. The fire began burning Jackson's  
7 property consisting of uphill grasslands, fences, and a barn, which ultimately was deemed a  
8 complete loss needing full replacement.

9           5.       Jackson's claim, therefore, arises out of fire damage caused by an electrical  
10 malfunction of PG&E's power pole and grade transformer which caused a fire to erupt damaging  
11 Jackson's property. The fire perimeter was approximately five acres and burned a barn causing  
12 it to collapse, damaging its contents and other surrounding property, including an adjacent fence,  
13 graze land, and cattle. The estimated cost to repair the barn is approximately **\$142,988**. The cost  
14 to repair and/or replace the fence, the cattle, the grazing land, and clean-up costs is **\$17,525**.  
15 Jackson's total claim is **\$160,513**.

16           6.       Jackson Fire Department was dispatched to contain the fire, and issued a full  
17 automatic aid wildland response, including air and ground units from California Department of  
18 Forestry and Fire Protection ("Cal Fire"), Amador Fire Protection District, and the City of Ione  
19 Fire Department.

20           7.       Cal Fire determined the ignition source of the fire to be faulty equipment and  
21 equipment malfunction, tracing burn indicators back to a PG&E power pole with a below grade  
22 transformer at its base. Cal Fire ruled out any other indication of the source of the fire, and  
23 ultimately unequivocally determined PG&E's faulty equipment to be the source of the fire and  
24 resulting damage.

25           8.       For the foregoing reasons, and based on the legal authority set forth in the  
26 opposition filed here with, the Bankruptcy Court should not sustain the Omnibus Objection as it  
27 relates to Claim No. 3002.

Executed under penalty of perjury under the laws of the State of California, this 19th day

of May, 2023, at Jackson, California.



BY:

CRYSTAL JACK

DECLARATION IN SUPPORT OF OPPOSITION TO OBJECTION TO CLAIM 3002 3

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